

Department of Water and Power



the City of Los Angeles

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September 9, 1999

Mr. Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 115
Sacramento, California 95814

Dear Mr. Breitenbach:

**CALFED Programmatic Environmental Impact Report/
Environmental Impact Statement (PEIR/EIS) Comment**

The following are comments by the City of Los Angeles Department of Water and Power (LADWP) on CALFED's revised draft PEIR/EIS. LADWP provided you with comments on the first draft of your environmental documentation a year ago. Our fundamental views on how CALFED should proceed with water use efficiency, water supply reliability, quality and financing elements of the program have remained unchanged. The following statements reiterate the City of Los Angeles' needs from the CALFED program, and I appreciate your consideration of our comments as you move forward with the PEIR/EIS process.

The CALFED program must remember the commitment it made from the start that all the stakeholders get better together. By this, CALFED must honor its pledge that the most feasible, cost-effective programs that balance needs and address the goals related to the common program elements of ecosystem restoration, water supply reliability, water quality, and levee integrity must proceed with the highest priority. Included in this deliberation must be a full disclosure of impacts associated with each of the options. While complying with the law, this act of due diligence would also diffuse future adversity, and enhance the credibility that the program has worked so hard to develop.

LADWP supports implementation of water conservation programs for all users of water in California. The City of Los Angeles is a prime example of what a strong conservation effort can accomplish. Today, citizens of our City are using the same amount of water they did 30 years ago, despite the fact that there is nearly 1 million more people living in our service area.

Water and Power Conservation... a way of life

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As effective as our water conservation effort has been; however, it does not fully address our needs in the area of water quality and water supply reliability. The benefits of a clean and reliable water supply from the Bay-Delta are very important to public health and our region's economic livelihood. I believe that the CALFED program is in a very unique and rare position to be able to address these issues and solve these problems. To do this in a successful manner, CALFED must balance needs and provide the necessary assurances to the people and the environment. I would like to reiterate the importance of assurances in water supply reliability and water quality as these greatly enhance LADWP's ability to plan accordingly for the water needs of the 3.8 million people now living in Los Angeles.

The following policy statements embody elements that are of vital importance to Los Angeles as CALFED moves forward with implementation of programs during the seven-year Stage 1 period:

- A complete and thorough analysis in the Final PEIS/EIR and Record of Decision (ROD) of the consequences of CALFED not meeting the water quality and supply reliability objectives outlined above. This should include estimated expenditures for enhanced water treatment facilities and alternative water supply sources and an evaluation of the feasibility/effectiveness of these alternatives versus a Delta solution.
- Continuous improvement to achieve long-term source water quality targets for municipal supplies from the Bay-Delta of 50 micrograms per liter for bromide.
- 3.0 milligrams per liter for total organic carbon. Implementation actions must address contaminant levels of concern for in-Delta, south Delta and urban export drinking water uses and to ensure protection of public health. Implementation actions may include Delta conveyance changes or a cost-effective combination of alternative source waters, source improvement, and treatment facilities. Water quality improvements need to be implemented in a timely manner to allow sufficient time to meet the effective date of drinking water quality regulations.
- Reduction in salinity levels resulting in Delta water quality that meets 150 milligrams per liter total dissolved solids in order to enhance water use efficiency and recycling projects in the City of Los Angeles and Southern California.

- **Quantified improvement to Southern California's water supply reliability including a "no-surprises" regulatory policy** agreed to by the time of the ROD to eliminate the current regulatory-induced uncertainties and to ensure enhancement of water supply. This "no-surprises" policy must ensure that the regulatory decisions are science-based, with an appropriate review process to promote informed decision making.
- State and federal funding and implementation of tools such as the Environmental Water Account to provide regulatory certainty, improve water supply reliability and water quality, and achieve environmental protection.
- Broad-based financing plan which includes federal and state funding to finance actions that provide public benefits. CALFED must demonstrate that Stage 1 and long-term actions provide beneficial value for those who will be asked to pay, commensurate with their proportional cost share.
- Implementation agreement from federal and state agencies that ensures balanced implementation of the CALFED plan and is agreeable with those expected to pay such that urban California will experience benefits commensurate with other stakeholders, including the environment.
- Completion of the EIS/EIR and incorporation of public comments prior to ROD on the water management strategy, finance plan, details of the Environmental Water Account, long-term governance proposal, and an acceptable assurances package.
- A water-use efficiency program that applies to all parts and users within the state, and includes a thorough examination of the economic costs of improving water use efficiencies with the potential water project construction alternatives outlined by the PEIR/EIS.
- A streamlined water transfer approval process and other measures that could encourage the development of an efficient water transfer market. CALFED actions must not hinder the ability of water users to meet their water supply needs through water transfers.

Again, I want to commend CALFED and its staff for all the progress that has been made to date. Though there is much more work to be done, we remain hopeful that your program will be able to deliver a proposal that captures the essence of its commitment from the start of this process – that is, we all get better together.

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Mr. Rick Breitenback

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September 9, 1999

Thank you for your consideration and we look forward to a successful continuation of the CALFED Bay-Delta Program.

Sincerely,



S. DAVID FREEMAN
General Manager

c: Los Angeles Metropolitan Water District Delegation
The Honorable Richard J. Riordan
Mr. Ronald F. Deaton, Chief Legislative Analyst
Mr. Paul K. Cauley, Chief Administrative Officer